1 Honorable James L. Robart 2 3 4 5 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 6 AT SEATTLE 7 8 Civil Action No.: 2:19-cv-01745-JLR PHILIPS NORTH AMERICA LLC, a Delaware Company; KONINKLIJKE PHILIPS N.V., a 9 Company of the Netherlands; and PHILIPS STIPULATION AND ORDER TO INDIA, LTD., an Indian Company, 10 EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S 11 Plaintiff, MOTION TO DISMISS 12 COUNTERCLAIMS AND RE-NOTE v. **MOTION** 13 SUMMIT IMAGING INC., a Washington Note on Motion Calendar: 14 Corporation; LAWRENCE R NGUYEN, an July 13, 2020 individual; and DOES 1-10, inclusive, 15 Defendants. 16 17 **STIPULATION** 18 Plaintiffs Philips North America LLC, Koninklijke Philips N.V., and Philips India Ltd. 19 filed their Motion to Dismiss Defendants' Counterclaims on July 8, 2020, with a noting date of 20 July 31, 2020 (Dkt. 50). Under Local Rule 7(d)(3), Defendants Summit Imaging Inc. and 21 22 Lawrence R. Nguyen's opposition papers are due on Monday, July 27, 2020. Defendants have requested an additional 14 days within which to respond to Plaintiffs' Motion to Dismiss, which 23 24 would extend the due date from July 27, 2020 to August 10, 2020, and proposed that Plaintiffs'

motion be re-noted to August 21, 2020, thus making Plaintiffs' reply brief due on that day.

STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO DISMISS COUNTERCLAIMS AND RE-NOTE MOTION 2:19-cv-01745-JLR 1

Plaintiffs have agreed to Defendants' request and proposal.

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Therefore, the parties by and through their respective counsel of record, and subject to this Court's approval, hereby stipulate and agree to an extension of time and re-noting of Plaintiffs' motion as follows:

	From:	To:
Note on Motion Calendar	July 31, 2020	August 21, 2020
Defendants' Response to Plaintiffs' Motion to Dismiss Counterclaims	July 27, 2020	August 10, 2020
Plaintiffs' Reply in Support of Motion to Dismiss Counterclaims	July 31, 2020	August 21, 2020

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STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO DISMISS COUNTERCLAIMS AND RE-NOTE MOTION 2:19-cv-01745-JLR 2

1 DATED this 13th day of July, 2020. 2 **SAVITT BRUCE & WILLEY LLP** SEED IP LAW GROUP LLP 3 /s/Stephen C. Willey /s/Marc C. Levy 4 Stephen C. Willey, WSBA #24499 Russell Tarleton, WSBA No. 17006 1425 Fourth Avenue, Suite 800 Marc C. Levy, WSBA No. 19203 5 Seattle, Washington 98101-2272 Jeffrey E. Danley, WSBA No. 52747 Telephone: 206.749.0500 Thomas A. Shewmake, WSBA No. 50765 6 Email: swilley@sbwLLP.com 701 Fifth Avenue, Suite 5400 7 Seattle, WA 98104 Telephone: (206) 622-4900 REED SMITH LLP 8 Carla M. Wirtschafter (pro hac vice) Email: RussT@seedip.com 1901 Avenue of the Stars, Suite 700 Email: MarcL@seedip.com 9 Los Angeles, CA 90067 Email: JeffD@seedip.com Email: TomShewmake@seedip.com Tel: (310) 734-5200 10 Email: cwirtschafter@reedsmith.com 11 Attorneys for Defendants, Summit Imaging Inc. and Kirsten R. Rydstrom (*Pro hac vice*) 12 Richard A. Graham (*Pro hac vice*) Lawrence R. Nguyen Reed Smith Centre 13 225 Fifth Ave 14 Pittsburgh, PA 15222 Telephone: (412) 288-3131 15 Email: krydstrom@reedsmith.com Email: rgraham@reedsmith.com 16 17 Gerard M. Donavan (pro hac vice) 1301 K Street, N.W. 18 Suite 1000, East Tower Washington, DC 20005-3317 19 Telephone: (202) 414-9200 Email: gdonovan@reedsmith.com 20 Lawrence E. James, Jr. (pro hac vice) 21 10 S. Wacker Drive, 40th Floor 22 Chicago, IL 60606 Telephone: (312) 207-2819 23 Email: ljames@reedsmith.com 24 Attorneys for Plaintiffs 25 Philips North America LLC, Koninklijke Philips N.V., and Philips India Ltd. 26 27

STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO DISMISS COUNTERCLAIMS AND RE-NOTE MOTION 2:19-cv-01745-JLR 3

1	ORDER
2	Pursuant to stipulation, it is so ordered.
3	DATED this 13th day of July , 2020.
4	311122 time <u>13tir</u> day of <u>13tir</u> , 2020.
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7	THE HONORABLE JAMES L. ROBART
8	United States District Judge
9	
10	Presented by:
11	SEED IP LAW GROUP LLP
12 13	/s/Marc C. Levy
14	E. Russell Tarleton, WSBA No. 17006
15	Marc C. Levy, WSBA No. 19203 Jeffrey E. Danley, WSBA No. 52747
16	Thomas A. Shewmake, WSBA No. 50765
17	Attorneys for Defendants Summit Imaging Inc. and Lawrence R. Nguyen
18	Summit Imaging The. and Earn enee It. Figure 1
19	SAVITT BRUCE & WILLEY LLP
20	/s/Stephen C. Willey
21	Stephen C. Willey, WSBA #24499
22	REED SMITH LLP Carla M. Wirtschafter (pro hac vice)
23	Kirsten R. Rydstrom (Pro hac vice) Richard A. Graham (Pro hac vice)
24	Gerard M. Donavan (pro hac vice)
25	Lawrence E. James, Jr. (pro hac vice)
26	Attorneys for Plaintiffs Philips North America LLC, Koninklijke Philips N.V., and Philips India Ltd.
27	
	STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO DISMISS COUNTERCLAIMS AND REMOTION

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COUNTERCLAIMS AND RE-NOTE MOTION

2:19-cv-01745-JLR